

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
 WASHINGTON, D.C.

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In re:

NOV 21 2003

Amendment of § 73.202 (b))
 Table of Allotments, FM Broadcast Stations)
 for Reservation of)
 Vacant FM Channel Allotment)
 Ch 244C2, Walnut Grove, Mississippi)
 for Noncommercial Educational Use)

Federal Communication Commission
 Bureau / Office

To: Assistant Chief, Office of Broadcast License Policy
 Media Bureau

**PETITION FOR RULE MAKING
 RESERVATION OF VACANT FM CHANNEL
 FOR NONCOMMERCIAL EDUCATIONAL USE**

Starboard Media Foundation, Inc., ("Starboard"), pursuant to the FCC's Public Notice, CA 02-2990 (Released September 30, 2003), hereby respectfully submits its Petition for Rule Making to reserve the following vacant FM Channel Allotment for Noncommercial Educational ("NCE") use:

244C2, 96.7 MHZ, Walnut Grove, MS

Starboard submits the attached engineering study in support of reservation of Channel 244C2, for NCE use. The study is in compliance with the reservation methodology set forth in *NCE Second Report and Order*, 18 FCC Rcd 6691 (2003) at 6703-06, and demonstrates that all the necessary criteria for reservation of this channel for NCE use are met. The engineering study provides a preclusion analysis which demonstrates that no other FM frequency in the reserve band is available for use at the vacant

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FM allocation coordinates, or within the allotment's predicted 1 mV/m contour. The study also demonstrates that the proposed frequency will provide a first or a second NCE service to the prescribed minimum population in the community and the service area.

If the proposed frequency is reserved for NCE use, Starboard declares that it intends to apply for the requested channel when opportunity to do so permits.

Accordingly, the requirements for reservation of the proposed frequency being met, Starboard respectfully requests that the Commission reserve the aforementioned vacant FM allotment for NCE use.

Respectfully submitted,

STARBOARD MEDIA FOUNDATION, INC.



By:

Mark Follett

Starboard Media Foundation, Inc.
2300 Riverside Dr.
Green Bay, WI 54301
920-469-3021

Date: November 20, 2003

DECLARATION OF MARK FOLLETT

I, Mark Follett, Chairman and CEO of Starboard Media Foundation, Inc., hereby declare under penalty of perjury that the information in the foregoing Petition for Rule Making for Reservation of Vacant FM Channel for Noncommercial Educational Use is true and correct to the best of my knowledge, information and belief.

A handwritten signature in black ink, appearing to read 'Mark Follett', with a stylized flourish at the end.

November 20, 2003

Date

Mark Follett

ENGINEERING STATEMENT IN SUPPORT OF
PETITION FOR RULE MAKING
RESERVATION OF VACANT FM CHANNEL
FOR NON-COMMERCIAL EDUCATIONAL USE

Starboard Media Foundation, Inc. ("Starboard"), is petitioning the Federal Communications Commission in Washington, D.C., to amend 47 Code of Federal Regulation §73.202(b), Table of FM Allotments. This engineering statement supports the petition of Starboard Media Foundation, Inc. to reserve FM Ch. 244C2 allotted to Walnut Grove, Mississippi for non-commercial educational use.

In support of said "petition", Starboard respectfully submits this Engineering Statement prepared by Lyle Robert Evans, Technical Consultant, attached hereto as Appendix I.

This engineering statement demonstrates that no FM channel in the reserve band is available for use at Walnut Grove. The activation of channel 244C2 at Walnut Grove will provide a first or second NCE FM service to the requisite minimum population residing within the projected service contour.

Attachment A is a map display of population with a breakdown of the service area. This allotment meets Criterion #1 for non-commercial reservation of a vacant FM allotment as described in Paragraph 34 of the Second Report and Order in MM Docket No. 95-31, released April 10, 2003.

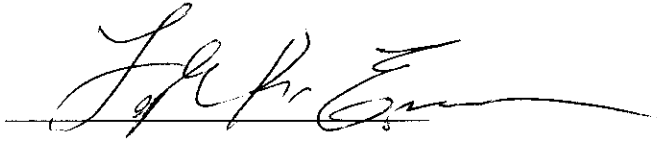
Attachment B consists of 5 preclusion study tables that satisfy Criterion #2 for non-commercial reservation of a vacant FM allotment as

described in Paragraph 35 of the Second Report and Order in MM Docket No. 95-31, released April 10, 2003. On the attached tables, the “In” column relates to interference received by the proposed illustrative station, and the “Out” column relates to the interference given by the proposed illustrative station. Numbers preceded with a negative sign (-) show prohibited overlap. Tables I – IV satisfy the first prong of this showing which are allocation studies based on a radius 1 km less than the distance to the predicted 60 dBu signal strength for a maximum Class C2, 50 kW at 150 meters HAAT facility at the coordinates for the bearings 0, 90, 180 and 270 degrees. These tables display no NCE FM channel available for non-commercial use at any of these locations. Table V satisfies the second prong of this showing and is an allocation study from the city center coordinates for the proposed community of license specifying a minimum Class C2, 25.1 kW at 30 meters HAAT facility. No rule compliant NCE FM facility can be authorized at this location under this criteria.

These studies show that vacant allotment Channel 244C2, Walnut Grove, Mississippi, has been shown to meet the criteria as outlined in Public Notice DA 03-2990 for a reservation proposal of the allotment for non-commercial educational use.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Lyle R. Evans', written over a horizontal line.

Lyle Robert Evans,
Technical Consultant to:
Starboard Media Foundation, Inc.

November 19, 2003

Lyle Robert Evans,
Technical Consultant
2300 Riverside Drive
Green Bay, WI 54301
(920) 469-3085

ENGINEERING STATEMENT; CONCLUDED